

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

FAWN VIGIL,

Defendant.

§
§
§
§
§
§
§

No. 16 CR 290 MV

**UNOPPOSED MOTION FOR FURLOUGH
(For Decision by Magistrate Judge)**

FAWN VIGIL, through her undersigned counsel, moves for a furlough to attend her daughter's science fair in Farmington, New Mexico, on March 11-12, 2016. As grounds therefor, she would show the Court as follows:

1. On February 5, 2016, Ms. Vigil was released to the La Pasada Halfway house, where she has resided without incident and in full compliance.
2. Her eleven-year-old daughter won her local science fair competition and will be competing at the regional science fair competition in Farmington from March 11-12:

Dear Parents and Guardians,

We are very excited to inform you that your child has been selected to attend the San Juan Regional Science Fair at Piedra Vista High School in Farmington, New Mexico during the weekend of March 11-12.

St. Francis School is happy to assume the cost of registration fees for all projects. Parents will be asked to cover their child's meals and transportation to and from the Science Fair. If you absolutely cannot attend science fair with your child, please inform Mr. or Mrs. Gomez immediately so that transportation can be worked out.

3. Ms. Vigil would leave La Pasada at 8:00 a.m. on Friday, March 11, and would return to La Pasada by 9:00 p.m. on Saturday, March 12, 2016.

4. Both AUSA Joseph Spindle and USPO John Lovato concur with the relief requested in this motion.

WHEREFORE, FAWN VIGIL respectfully prays that the Court enter an order permitting her temporary release from La Pasada for the purpose of attending her daughter's science fair in Farmington, New Mexico on March 11, 2016, returning on March 12, 2016.

Respectfully submitted,

FEDERAL PUBLIC DEFENDER
111 Lomas NW, Suite 501
Albuquerque, NM 87102
(505) 346-2489

[Electronically filed]
Kari Converse
Attorney for Ms. Vigil

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT on March 8, 2016, I filed the foregoing electronically through the CM/ECF system, which caused AUSA Joe Spindle to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

I FURTHER CERTIFY THAT on such date I served the foregoing by e-mail on the following non-CM/ECF Participants: John Lovato, USPO

[Electronically filed]
Kari Converse